



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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February 27, 1998

Mr. James E. Rasmussen
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, MSIN: A5-15
Richland, WA 99352

Mr. William D. Adair
Fluor Daniel Hanford, Inc.
2440 Stevens Center, MSIN: H6-21
Richland, WA 99352

Dear Messrs. Rasmussen and Adair:

Re: Update to Letter Dated December 29, 1997, "Class 1 Modifications to the Hanford Facility Resource Conservation Recovery Act (RCRA) Permit (October 1994 – October 1997)"

This letter updates the 616 Nonradioactive Dangerous Waste Storage Facility (NRDWSF) portion of the above referenced letter. The Washington State Department of Ecology (Ecology) has met with representatives of U.S. Department of Energy, Richland Operations Office (USDOE) and its contractors. This letter transmits the agreements made with respect to the 616 NRDWSF unit specific permit.

1. The training plan submitted in the Class 1 Modification notification for Quarter ending September 30, 1997, is contingently approved. This is a generic training plan that has also been submitted in the Low-Level Burial Ground, Waste Receiving and Processing, and Central Waste Complex permits. Any permit conditions written for these unit specific permits will also be written for the 616 NRDWSF where applicable. In addition, two conditions that will be written for all PHMC Treatment, Storage, or Disposal units and included in Modification D of the Hanford Facility RCRA Permit are: 1) a copy of the TMX report for a specific TSD unit will be available to Ecology upon request; and 2) records will be maintained current and the TMX system will be updated at least quarterly.
2. The approved Waste Analysis Plan (from Class 1 Modifications for quarter ending June 30, 1995) is compliant for receipt of on-site waste and off-site waste from USDOE owned and operated units (i.e., 300 Area, 712 Building, and the Federal Building). USDOE is not to receive other off-site waste at this unit until the Waste Analysis Plan has been revised to

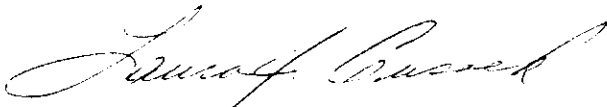
Messrs. Rasmussen and Adair
February 27, 1998
Page 2

include waste acceptance/verification criteria for the receipt of other off-site waste. A revision of this type would be considered a Class 3 Modification. Ecology intends to include this requirement as a permit condition in Modification D of the Permit.

3. As a result of a recent compliance action, the Permittees have been required to revise all emergency preparedness documentation. USDOE is directed to use the Building Emergency Plan that was submitted as a Class 1 Modification for the quarter ending June 30, 1995, until the new documentation is finalized. USDOE must submit a draft revised emergency preparedness documentation for the 616 NRDWSF by April 15, 1998, in order to have the document certified by June 1, 1998, for inclusion in Modification D of the Site Wide Permit.

If USDOE does not concur with these agreements, please inform me in writing by March 27, 1998.

Sincerely,



Laura J. Cusack, P.E.
Hanford Facility RCRA Permit Manager

LJC:ch

cc: Cliff Clark, USDOE
Rick Engleman, WMH
Sue Price, FDH
Administrative Record: 616 NRDWSF
Administrative Record: **Site Wide Permit**

bcc: Moses Jaraysi, Ecology
Ron Skinnarland, Ecology
Central Files: Site Wide Permit
Central Files: 616 NRDWSF